

UPC is attached as Exhibit “C.” A copy of Plaintiffs’ Original Petition is attached as Exhibit “D.” A copy of UPC’s Original Answer to Plaintiffs’ Original Petition is attached as Exhibit “E.” The list of Counsel and Parties to the Case is attached as Exhibit “F.” A copy of this Notice is also being filed with the state court and served upon the Plaintiffs.

5. Venue is proper in this Court under 28 U.S.C. § 1441(a) because this district and division embrace Hidalgo County, Texas, the place where the removed action has been pending.

B. Basis for Removal

6. Removal is proper based on diversity of citizenship under 28 U.S.C. §§ 1332(a), 1441(a) and 1446. This is a civil action between citizens of different states, and the amount in controversy exceeds the sum of \$75,000.00, exclusive of interest and costs.

7. Plaintiffs are, and were at the time the lawsuit was filed, residents and citizens of Texas.

8. UPC was at the time this action was commenced, and still is, a foreign (Florida) property and casualty insurance company authorized to do business in the State of Texas. UPC is organized under Chapter 982 of the Texas Insurance Code.

9. Upon information and belief, Defendant Tanji Meador was at the time this action was commenced, and still is, a resident and citizen of Florida.

10. Therefore, complete diversity of citizenship exists between Plaintiff and the Defendants.

11. In addition, the amount in controversy exceeds \$75,000.00. Plaintiffs’ Petition seeks damages “over \$100,000 but not more than \$200,000.” *See* Exhibit D § XI.

C. Conclusion and Prayer

Accordingly, all requirements are met for removal under 28 U.S.C. §§ 1332 and 1441. UPC hereby removes this case to this Court for trial and determination.

Respectfully submitted,

By: /s/ Rhonda J. Thompson
RHONDA J. THOMPSON, ATTORNEY-IN-CHARGE
rthompson@thompsoncoe.com
State Bar No. 24029862
Southern District No.: 17055
COURTNEY C. KASPER
ckasper@thompsoncoe.com
State Bar No. 24078771
Southern District No.: 1409957

THOMPSON, COE, COUSINS & IRONS, LLP.
700 N. Pearl Street, 25th Floor
Dallas, Texas 75201
(214) 871-8200 - Telephone
(214) 871-8209 – Fax

COUNSEL FOR DEFENDANT UPC

CERTIFICATE OF SERVICE

This is to certify that on the 27th day of January, 2016, a true and correct copy of the foregoing was delivered to the following counsel of record by electronic service and/or facsimile transmission and/or certified mail, return receipt requested:

Kevin S. Baker
Mahsa Tajipour
KETTERMAN ROWLAND & WESTLUND
16500 San Pedro, Suite 302
San Antonio, Texas 78232
Counsel for Plaintiffs

/s/ Rhonda J. Thompson
Rhonda J. Thompson